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USNRC REGION II
ATLANTA, GEORGIA

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NED-83-401

July 27, 1983

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-366
I&E Report
83-16

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

Georgia Power Company submits the following in response to the violation cited by the inspection conducted by Mr. B. R. Crowley of your office on June 6-8, 1983. The subject violation was applicable to Hatch Unit 2 only.

VIOLATION

Technical Specification 6.8.1.c requires that procedures be implemented for surveillance of safety-related equipment. Paragraph G of the applicable procedure for Technical Specification Requirements 4.4.8, requires in part that, for flaw indications found during inservice inspection and reported on an indication notification form, sufficient nondestructive test expertise adequately resolve necessary report work to eliminate the flaw indication or prove insignificant the source of the indication.

Contrary to the above, on April 28, 1982, procedure HNP-904 was not properly implemented (sic) in that the liquid penetrant inspection for weld 2E11-1RHR-20-RS-1BC/2G21-1RWCU-6D-1 (sic) was accepted without necessary repair work to eliminate or prove insignificant rough conditions in the weld edges which held excess penetrant possibly masking significant indications.

This is a Severity Level V Violation (Supplement I).

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RESPONSE

Admission or denial of alleged violation: The violation occurred. It should be noted that the qualified inspector felt the weld was adequately prepared prior to his April 28, 1982 inspection. In addition, the weld was subsequently found acceptable during the 1983 maintenance/refueling outage after surface grinding and reexamination by a qualified inspector.

Reason for violation: The violation occurred as a result of a decision to not perform grinding on piping for the resolution of indications which did not appear to be service induced. It was decided that if an indication appeared to be non-service (process) induced, and visual examination could determine the cause of the indications, it was to be disposed as process induced and left as found. Such was the case with weld 2E11-1RHR-20-RS-LBC/2G31-1RWCU-6D-1.

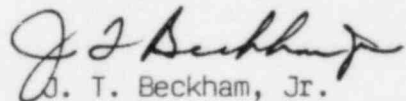
Corrective steps which have been taken and the results achieved: As a result of the concern raised by the NRC inspector, surface grinding was performed to eliminate the causes of the indications. The area was reexamined by a qualified inspector and found acceptable.

Corrective steps that will be taken to avoid further violations: Although this case appears to be an isolated event, it is apparent that a revision to the HNP-904 procedure is necessary. The procedural change will give specific guidance regarding how indications are to be resolved. The revision to HNP-904 will be submitted to the Plant Review Board by September 1, 1983.

Date when full compliance will be achieved: Full compliance was achieved on June 4, 1983, when the weld in question was reexamined by a qualified inspector and found acceptable.

Should you have any questions in this regard, please contact this office.

Sincerely yours,


J. T. Beckham, Jr.

JAE/mb
xc: L. T. Gucwa
H. C. Nix, Jr.
Senior Resident Inspector